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March 13, 2023

**BY ECF**

Hon. Zahid N. Quraishi, U.S.D.J.  
United States District Court  
for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: Corsi v. Cellco Partnership, , No. 3:22-cv-4621-ZNQ (D.N.J.)**

Dear Judge Quraishi:

Two weeks ago, Plaintiffs and Defendant shared with the Court some initial correspondence with the American Arbitration Association (“AAA”) pertaining to a series of Demands for Arbitration—substantively identical to the claims pleaded in this case—which Plaintiffs’ counsel brought directly in the arbitral forum on behalf of other clients of theirs (while fighting Verizon’s motion to compel arbitration of Plaintiffs’ claims here). Specifically, on February 27, I wrote on behalf of Verizon to dispute plaintiffs’ counsel’s characterization that “AAA is not willing to administ[er] arbitrations pursuant to Verizon’s November 2021 Customer Agreement.”

Consistent with Verizon’s position in that correspondence, on Friday, March 10, AAA confirmed it will “proceed with the administration of the additional 1,968 cases filed by Mr. Hattis on behalf of his clients,” and will neither reverse that decision nor subject it to further review by a Process Arbitrator. (Attached as Exhibit A). AAA’s March 10 correspondence demonstrates conclusively that AAA will administer arbitrations pursuant to Verizon’s November 2021 Customer Agreement.

As I stated in my letter to Your Honor dated February 27, because the central premise of Plaintiffs’ opposition to Verizon’s pending motion no longer exists, Verizon submits that Plaintiffs no longer have any valid basis to oppose the Court compelling them to arbitrate their claims.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jeff Jacobson".

Jeffrey S. Jacobson

cc: All counsel (via ECF)